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**From:** Mark Miedtke [mailto:mmiedtke@csbankmn.com]

**Sent:** Monday, October 05, 2009 4:47 PM

**To:** Assessments

**Subject:** proposed rule

If you will recall, I have e-mailed you over the last many years regarding allowing non-financial firms to issue insured deposits without paying an initial premium, about allowing semi-financial firms to offer products that we as community banks could not offer and about the fact that you allowed savings and loans to offer products that we could not or would not. We are still paying for the savings and loans poor decisions which you allowed to continue. Now you are going to make us pay for the losses of our most recent competitors actions which you also allowed to go on much longer than the market new should have been allowed. I've even e-mailed you that the community banks can not afford to pay for all of the losses you have allowed to grow—community banks were able to pay for community banks, but the payments we have made for others have broken the system. Your plan to have us prepay our premiums at the outset looks good; however, are you certain that your current loss projections are even close? Given how far you've missed it already, and based upon studies done by others in the financial industry, it would seem that the losses to be taken by the FDIC are far greater than you are projecting. Are you afraid to realistically cash flow out the probable losses? It would be better for all of our planning and would allow us to start recovering if we prepared for the potential losses now and not start making special assessments again as the losses continue to worsen. In any event, you also have to assess based on asset size. You have to start assessing where the risk is—even if it is too late—safely run Banks should not have to carry the brunt of this financial fiasco again, but there is no one else to turn to so they will.

Mark Miedtke, President  
Citizens State Bank of Hayfield  
507-477-2212  
mmiedtke@csbankmn.com